

GEORGE HAWKINS

V.

Defendants.

Civil Action No. 3:23-cv-00232

Plaintiff George Barry Hawkins, Jr. (“Plaintiff” or “Mr. Hawkins”) moves for summary judgment on his two First Amendment claims against Defendants Governor Glenn Youngkin and Secretary of the Commonwealth Kelly Gee’s (“Defendants”) arbitrary system of voting rights restoration.

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Blind of North Carolina, Inc., 487 U.S. 781, 802 (1988). Respectfully, for each of these independent reasons and claims, the Court should grant Plaintiff's motion for summary judgment as to Counts One and Two and issue a declaratory judgment that VA. CONST. art. II, § 1, VA. CONST. art. 5, § 12, and Va. Code Ann. § 24.2-101 violate the First Amendment to the U.S. Constitution.

To remedy these constitutional violations, Plaintiff respectfully requests that this Court permanently enjoin Defendants, as well as their respective agents, officers, employees, successors, and all persons acting in concert with them, from administering the voting rights restoration system in VA. CONST. art. II, § 1, VA. CONST. art. V, § 12, and Va. Code Ann. § 24.2-101 in an arbitrary manner, and order Defendants, as well as their respective agents, officers, employees, successors, and all persons acting in concert with them, to implement a new and non-arbitrary system of voting rights restoration governed by specific, objective rules and criteria and reasonable, definite time limits.

Finally, Plaintiffs request that this Court retain jurisdiction to enforce its judgment and grant such other relief as this Court deems just and proper.

Dated: February 14, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 14, 2024, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a “Notice of Electronic Filing” to the following CM/ECF participants:

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